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5 *Attorneys for Plaintiffs*

6
7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA
9

10 BERTHA AMEZCUA PADILLA,
11 individually; D.G.L., a minor, by and
12 through her guardian *ad litem*, Cristina
13 Lopez, individually and as successor-in-
14 interest to Luis Guerrero; O.J.G.R., a minor,
15 by and through her guardian *ad litem*,
Theresa Ramirez, individually and as
successor-in-interest to Luis Guerrero,

16 Plaintiffs,

17 vs.

18 CITY OF SANTA ANA, a public entity;
19 and DOES 1-20, inclusive,
20

21 Defendants.
22
23

CASE NO.

COMPLAINT FOR DAMAGES

1. Fourth Amendment (42 U.S.C. § 1983)
2. Fourteenth Amendment (42 U.S.C. § 1983)
3. Municipal Liability (42 U.S.C. § 1983)
4. Battery (Wrongful Death and Survival Action)
5. Violation of Bane Act (Cal. Civil Code § 52.1)
6. Negligence (Wrongful Death and Survival Action)

DEMAND FOR JURY TRIAL

24
25 **COMPLAINT FOR DAMAGES**

26 Plaintiffs Bertha Amezcua Padilla, D.G.L., and O.J.G.R. (all together, "Plaintiffs"),
27 for their Complaint against Defendants City of Santa Ana and Does 1-20, inclusive, allege
28 as follows:

JURISDICTION AND VENUE

1
2 1. This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and
3 1343(a)(3)-(4) because Plaintiffs assert claims arising under the laws of the United States,
4 including 42 U.S.C. § 1983 and the Fourth and Fourteenth Amendments of the United
5 States Constitution. The Court has supplemental jurisdiction over Plaintiffs' claims
6 arising under state law pursuant to 28 U.S.C. § 1367(a), because those claims are so related
7 to the federal claims that they form part of the same case or controversy under Article III
8 of the United States Constitution.

9 2. Venue is proper in this Court under 28 U.S.C. § 1391(b) because (1) a
10 substantial part of the events or omissions giving rise to the claim occurred in this judicial
11 district; and (2) Defendants reside within this judicial district.

PARTIES

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13 3. Plaintiff Bertha Amezcua Padilla is the biological mother of Decedent Luis
14 Guerrero ("Decedent"). At all relevant times, Plaintiff Bertha Amezcua Padilla is and was
15 a resident of the County of Orange, State of California.

16 4. Plaintiffs D.G.L. and O.J.G.R. are the minor children of Decedent. A petition
17 to appoint Cristina Lopez, D.G.L.'s mother, as her guardian *ad litem* has been filed
18 concurrently with this Complaint. A petition to appoint Theresa Ramirez, O.J.G.R.'s
19 mother, as her guardian *ad litem* has also been filed concurrently with this Complaint.
20 At all relevant times, Plaintiffs D.G.L. and O.J.G.R. are and were residents of the County
21 of Orange, State of California. Their co-successor-in-interest declarations pursuant to
22 CCP section 377.32 are attached hereto as "Exhibit A."

23 5. At all relevant times, Defendant City of Santa Ana ("City") is and was a
24 municipal corporation existing under the laws of the State of California with the capacity
25 to be sued. The City is responsible for the actions, omissions, policies, procedures,
26 practices, and customs of its various agents and agencies, including the Santa Ana Police
27 Department and its agents and employees. The City was responsible for ensuring that the
28 actions, omissions, policies, procedures, practices, and customs of its employees and

agents complied with the laws of the United States and the State of California. At all relevant times, City was the employer of Defendants Does 1-20 and is vicariously liable for their acts and omissions pursuant to California Government Code § 815.2.

6. Defendants Does 1-20 are sworn officers employed by City, who were directly involved in causing Decedent's death. The names of Does 1-20 are unknown to Plaintiffs at this time, who therefore sue such officers by fictitious names. Plaintiffs will amend their Complaint to show the true names and capacities of Does 1-20 when they have been ascertained. At all relevant times, Does 1-20 were acting under color of law and within the course and scope of their respective duties as police officers and with the complete authority and ratification of their principal, City.

7. At all relevant times, each and every defendant was the agent of each and every other defendant and had the legal duty to oversee and supervise the hiring, conduct and employment of each and every defendant.

8. On April 26, 2022, Plaintiffs filed a claim for damages with City pursuant to applicable sections of the California Government Code. Plaintiffs' claims have been rejected by operation of law.

FACTS COMMON TO ALL CLAIMS FOR RELIEF

9. Plaintiffs repeat and re-allege each and every allegation in the above paragraphs of this Complaint with the same force and effect as if fully set forth herein.

10. On April 1, 2022, at approximately 11:45 p.m., Defendant Doe officers from the Santa Ana Police Department responded to the La Quinta Inn on 2721 Hotel Terrace in Santa Ana, California.

11. Defendant Doe officers confronted Decedent in one of the motel's rooms.

12. Decedent was unarmed and did not pose an immediate threat of death or serious bodily injury to any other person, including Defendant Doe officers.

13. Defendant Doe officers tased Decedent and tackled him to the ground.

1 14. After tackling Decedent to the ground, Defendant Doe officers restrained him
2 in a prone position for several minutes, including by applying pressure to his back and
3 neck.

4 15. Defendant Doe officers never checked to see if Decedent could breathe or if
5 he had a pulse while restraining him, despite Decedent displaying obvious signs of being
6 unable to breathe.

7 16. As a result of the improper restraint, Decedent died.

8 **FIRST CLAIM FOR RELIEF**

9 **Fourth Amendment (42 U.S.C. § 1983)**

10 (Against Defendants Does 1-20)

11 17. Plaintiffs repeat and re-allege each and every allegation in the above
12 paragraphs of this Complaint with the same force and effect as if fully set forth herein.

13 18. Defendants Does 1-20 used excessive and unreasonable force against
14 Decedent when they tased him, tackled him to the ground, and improperly restrained him
15 in such a way that ultimately caused his death. This conduct deprived Decedent of his
16 right to be secure in his person against unreasonable searches and seizures as guaranteed
17 under the Fourth Amendment and applied to state actors by the Fourteenth Amendment.

18 19. As a result of the foregoing, Decedent lost his life. Up until the time of his
19 death, he experienced physical pain and emotional distress.

20 20. The conduct of Defendants Does 1-20 was willful, wanton, malicious, and
21 done with reckless disregard for the rights and safety of Decedent, and therefore warrants
22 the imposition of punitive damages.

23 21. Defendants Does 1-20 are liable for Decedent's injuries and death, either
24 because they engaged in the above conduct, because they were integral participants in the
25 above conduct, or because they failed to intervene to prevent the above conduct.

26 22. Plaintiffs D.G.L. and O.J.G.R. bring this claim in their individual and
27 representative capacities and seek survival and wrongful death damages. Plaintiffs also
28 seek attorney fees.

SECOND CLAIM FOR RELIEF

Fourteenth Amendment (42 U.S.C. § 1983)

(Against Defendants Does 1-20)

23. Plaintiffs repeat and re-allege each and every allegation in the above paragraphs of this Complaint with the same force and effect as if fully set forth herein.

24. Plaintiffs each had a cognizable interest under the Due Process Clause of the Fourteenth Amendment of the United States Constitution to be free from state actions that would deprive them of life, liberty, or property in such a manner as to shock the conscience, including state actions that interfere with Plaintiffs' familial relationship with their loved one and family member, Decedent.

25. The aforementioned actions of Defendants Does 1-20, along with undiscovered conduct, shock the conscience, in that they acted with deliberate indifference to the constitutional rights of Plaintiffs or with purpose to harm unrelated to any legitimate law enforcement objective.

26. As a result of Defendants Does 1-20's conduct, Decedent lost his life and Plaintiffs were harmed.

27. The conduct of Defendants Does 1-20 was willful, wanton, malicious, and done with reckless disregard for the rights and safety of Decedent, and therefore warrants the imposition of punitive damages.

28. Plaintiffs D.G.L., O.J.G.R., and Bertha Amezcua Padilla bring this claim in their individual capacities and seek wrongful death damages for the loss of familial relationship. Plaintiffs also seek attorney fees.

THIRD CLAIM FOR RELIEF

Municipal Liability (42 U.S.C. § 1983)

(Against City)

29. Plaintiffs repeat and re-allege each and every allegation in the above paragraphs of this Complaint with the same force and effect as if fully set forth herein.

30. Defendants Does 1-20 acted under color of law.

1 31. The acts of Defendants Does 1-20 deprived Decedent and Plaintiffs of their
2 particular rights under the United States Constitution, as described above.

3 32. Upon information and belief, the training policies of the City were not
4 adequate to train law enforcement officers to handle the usual and recurring situations
5 with which they must deal. Specifically, as evidenced by this incident, the City did not
6 adequately train its officers with respect to restraint and/or positional asphyxia. The City
7 failed to train its officers about the risks – including death – of restraining subjects in prone
8 positions while applying pressure to their necks and backs. Moreover, the City did not
9 train its officers with respect to prone restraint cardiac arrest, which occurs when subjects
10 are improperly restrained by officers in a prone position and without adequate ventilation.
11 The City's inadequate training policies directly contributed to Decedent's death.

12 33. Based on the above, Plaintiffs contend that the City is directly liable under
13 42 U.S.C. § 1983 and *Monell v. Dep't of Soc. Servs. of N.Y.*, 436 U.S. 658, 691 (1978).

14 **FOURTH CLAIM FOR RELIEF**

15 **Battery (Wrongful Death and Survival Action)**

16 (Against All Defendants)

17 34. Plaintiffs repeat and re-allege each and every allegation in the above
18 paragraphs of this Complaint with the same force and effect as if fully set forth herein.

19 35. Defendants Does 1-20, while working as police officers, and acting within
20 the course and scope of their duties, used unreasonable and excessive force against
21 Decedent. As a result of the actions of Defendants Does 1-20, Decedent was harmed and
22 ultimately died.

23 36. The City is vicariously liable for the wrongful acts of Defendants Does 1-20
24 pursuant to section 815.2(a) of the California Government Code. Defendants Does 1-20
25 are liable for their own wrongful acts pursuant to section 820(a) of the California
26 Government Code.

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SIXTH CLAIM FOR RELIEF

Negligence (Wrongful Death and Survival Action)

(Against All Defendants)

47. Plaintiffs repeat and re-allege each and every allegation in the above paragraphs of this Complaint with the same force and effect as if fully set forth herein.

48. The actions and inactions of Defendants Does 1-20 described above – together with undiscovered conduct – were negligent and reckless.

49. The following conduct, without limitation, fell below the standard of care:

- a. The decision to tase Decedent;
- b. The failure to use proper de-escalation tactics;
- c. The decision to tackle Decedent to the ground;
- d. The decision to improperly restrain Decedent by applying pressure to his neck and back while he remained in a prone position; and
- e. The failure to check on Decedent's breathing while he was being restrained in a prone position and during which time he exhibited clear signs of being unable to breathe.

50. As a direct and proximate result of the conduct of Defendants Does 1-20 as alleged above, together with other undiscovered conduct, Decedent was harmed and ultimately died.

51. Defendant City is vicariously liable for the wrongful acts of Defendants Does 1-20 pursuant to section 815.2(a) of the California Government Code. Defendants Does 1-20 are liable for their own wrongful acts pursuant to section 820(a) of the California Government Code.

52. Plaintiffs D.G.L. and O.J.G.R. bring this claim in their individual and representative capacities and seek wrongful death and survival damages under California law.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request entry of judgment in their favor and against Defendants as follows:

- A. For wrongful death damages, in an amount to be proven at trial;
- B. For survival damages – including for Decedent’s pre-death pain and suffering – under state and federal law, in an amount to be proven at trial;
- C. For punitive damages against the individual defendants, in an amount to be proven at trial;
- D. For statutory damages pursuant to Cal. Civil Code § 52.1, in an amount to be proven at trial;
- E. For interest;
- F. For reasonable costs of this suit and attorneys’ fees; and
- G. For such further other relief as the Court may deem just, proper, and appropriate.

Dated: July 18, 2022

TAYLOR & RING

By: /s/ Neil K. Gehlawat
John C. Taylor
Neil K. Gehlawat
Attorneys for Plaintiffs

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury.

Dated: July 18, 2022

TAYLOR & RING

By: /s/ Neil K. Gehlawat

John C. Taylor

Neil K. Gehlawat

Attorneys for Plaintiffs

Exhibit A

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10 BERTHA AMEZCUA PADILLA,
11 individually; D.G.L., a minor, by and
12 through her guardian *ad litem*, Cristina
Lopez, individually and as successor-in-
13 interest to Luis Guerrero; O.J.G.R, a minor,
14 by and through her guardian *ad litem*,
Theresa Ramirez, individually and as
15 successor-in-interest to Luis Guerrero,

16 Plaintiffs,

17 vs.

18
19 CITY OF SANTA ANA, a public entity;
and DOES 1-20, inclusive,
20

21 Defendants.
22

CASE NO.

**DECLARATION OF CRISTINA
LOPEZ ON BEHALF OF MINOR
D.G.L. PURSUANT TO CCP § 377.32**

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DECLARATION OF CRISTINA LOPEZ ON BEHALF OF MINOR D.G.L.

I, Cristina Lopez, declare:

1. I am the biological mother and guardian *ad litem* for minor D.G.L., who is the daughter of decedent, Luis Guerrero.
2. Luis Guerrero passed away on April 2, 2022 in Santa Ana, California.
3. No proceeding is now pending in California for administration of decedent's estate.
4. D.G.L. is decedent's co-successor-in-interest and succeeds to his interest in this action along with his other minor child (O.J.G.R.).
5. No other person has a superior right to commence the action or proceeding or to be substituted for the decedent in the pending action or proceeding.
6. A certified copy of decedent's death certificate is attached hereto as "Exhibit 1."

I declare under oath and penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 12, 2022, in Santa Ana, California.



Cristina Lopez, on behalf of minor D.G.L.

1 John C. Taylor, State Bar No. 78389
2 Neil K. Gehlawat, State Bar No. 289388
3 **TAYLOR & RING, LLP**
4 1230 Rosecrans Avenue, Suite 360
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
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13 BERTHA AMEZCUA PADILLA,
14 individually; D.G.L., a minor, by and
15 through her guardian *ad litem*, Christina
16 Lopez, individually and as successor-in-
17 interest to Luis Guerrero; O.J.G.R, a minor,
18 by and through her guardian *ad litem*,
19 Theresa Ramirez, individually and as
20 successor-in-interest to Luis Guerrero,

21 Plaintiffs,

22 vs.

23 CITY OF SANTA ANA, a public entity;
24 and DOES 1-20, inclusive,

25 Defendants.
26
27
28

CASE NO.

**DECLARATION OF THERESA
RAMIREZ ON BEHALF OF MINOR
O.J.G.R. PURSUANT TO CCP §
377.32**

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DECLARATION OF THERESA RAMIREZ ON BEHALF OF MINOR O.J.G.R.

I, Theresa Ramirez, declare:

1. I am the biological mother and guardian *ad litem* for minor O.J.G.R., who is the daughter of decedent, Luis Guerrero.
2. Luis Guerrero passed away on April 2, 2022 in Santa Ana, California.
3. No proceeding is now pending in California for administration of decedent's estate.
4. D.G.L. is decedent's co-successor-in-interest and succeeds to his interest in this action along with his other minor child (D.G.L.).
5. No other person has a superior right to commence the action or proceeding or to be substituted for the decedent in the pending action or proceeding.
6. A certified copy of decedent's death certificate is attached hereto as "Exhibit 1."

I declare under oath and penalty of perjury under the laws of the State of California

that the foregoing is true and correct.

Executed on July 12, 2022, in Santa Ana, California.



Theresa Ramirez, on behalf of minor O.J.G.R.

Exhibit 1

STATE OF CALIFORNIA
CERTIFICATION OF VITAL RECORDCOUNTY OF ORANGE
HEALTH CARE AGENCY

3052022089133

CERTIFICATE OF DEATH

3202230007263

STATE FILE NUMBER 3052022089133		LOCAL REGISTRATION NUMBER 3202230007263	
1. NAME OF DECEASED - FIRST (Last)		3. LAST (Family)	
LUIS		GUERRERO AMEZCUA	
2. MIDDLE FERNANDO		4. DATE OF BIRTH mm/dd/yyyy 10/27/1986	
5. AGE Yrs. 35		6. SEX M	
7. DATE OF DEATH mm/dd/yyyy 04/02/2022		8. HOUR (24 Hours) 0855	
9. BIRTH STATE/FOREIGN COUNTRY MEXICO		10. SOCIAL SECURITY NUMBER XXX-XX-XXXX	
11. EVER IN U.S. ARMED FORCES? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK		12. MARITAL STATUS (as of time of death) NEVER MARRIED	
13. EDUCATION - Highest Level Completed SOME COLLEGE <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		14. DECEASED'S RACE - Up to 3 races may be listed (see instructions on back) MEXICAN <input checked="" type="checkbox"/> HISPANIC <input type="checkbox"/> NO	
15. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED TOW TRUCK DRIVER		16. KIND OF BUSINESS OR INDUSTRY (e.g., grocery store, road construction, employment agency, etc.) TRANSPORTATION	
17. YEARS IN OCCUPATION 4		18. DECEASED'S RESIDENCE (Street and number, or location) 1865 ROCKCREST DRIVE	
19. CITY CORONA		20. COUNTY/PROVINCE RIVERSIDE	
21. ZIP CODE 92880		22. YEARS IN COUNTY 0	
23. STATE/FOREIGN COUNTRY CA		24. INFORMANT'S NAME, RELATIONSHIP BERTHA AMEZCUA, MOTHER	
25. INFORMANT'S ADDRESS (Street and number, or rural route number, city or town, state and zip) 1865 ROCKCREST DRIVE, CORONA, CA 92880		26. NAME OF SURVIVING SPOUSE/SP - FIRST -	
27. MIDDLE -		28. LAST (BIRTH NAME) -	
29. NAME OF FATHER/SP - FIRST JOSE		30. MIDDLE LUIS	
31. LAST GUERRERO		32. BIRTH STATE MEXICO	
33. NAME OF MOTHER/SP - FIRST BERTHA		34. MIDDLE PADILLA	
35. LAST (BIRTH NAME) AMEZCUA		36. BIRTH STATE MEXICO	
37. DEPOSITION DATE mm/dd/yyyy 04/14/2022		38. PLACE OF FINAL DISPOSITION FAIRHAVEN MEMORIAL PARK 1702 FAIRHAVEN AVENUE, SANTA ANA, CA 92705	
39. TYPE OF DISPOSITION CREMATE/BURIAL		40. SIGNATURE OF EMBALMER JAE P SIMON	
41. NAME OF FUNERAL ESTABLISHMENT FAIRHAVEN MEMORIAL PARK & MORTUARY		42. LICENSE NUMBER FD1313	
43. SIGNATURE OF LOCAL REGISTRAR REGINA CHINSIO-KWONG, DO		44. LICENSE NUMBER EMB8340	
45. DATE mm/dd/yyyy 04/13/2022		46. IF HOSPITAL, SPECIFY ONE: <input checked="" type="checkbox"/> IP <input type="checkbox"/> EPICP <input type="checkbox"/> DCA <input type="checkbox"/> Hospice <input type="checkbox"/> Nursing Home/LTC <input type="checkbox"/> Decedent's Home <input type="checkbox"/> Other	
47. IF OTHER THAN HOSPITAL, SPECIFY ONE: <input checked="" type="checkbox"/> IP <input type="checkbox"/> EPICP <input type="checkbox"/> DCA <input type="checkbox"/> Hospice <input type="checkbox"/> Nursing Home/LTC <input type="checkbox"/> Decedent's Home <input type="checkbox"/> Other		48. CITY SANTA ANA	
49. COUNTY ORANGE		50. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number, or location) 1001 N TUSTIN AVE	
51. CAUSE OF DEATH IMMEDIATE CAUSE (Final disease or condition resulting in death) (A) PENDING INVESTIGATION		52. DEATH REPORTED TO CORONER (A) YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> (B) 22-02161-AA	
53. SEQUENTIALLY list conditions, if any, leading to cause on Line A. Enter UNDERLYING CAUSE (disease or injury that initiated the events resulting in death) LAST (C) UNKNOWN		54. BIOPSY PERFORMED? (A) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (B) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (C) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (D) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (E) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (F) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (G) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (H) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (I) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (J) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (K) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (L) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (M) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> (N) YES <input type="checkbox"/> NO <input checked="" 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